

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA    )  
  )  
          V.                            )     DOCKET NO. 99-CR-10428-JLT  
  )  
JOHN J. CONNOLLY, JR.         )

**GOVERNMENT’S RESPONSE TO “DEFENDANT  
JOHN J. CONNOLLY, JR.’S MOTION TO HAVE ALL REPORTS,  
DOCUMENTS AND ANY AND ALL OTHER RELATED  
MATERIALS RELATIVE TO THE WITNESS JAMIE PARKER  
BE PROVIDED TO THE DEFENDANT BY THE GOVERNMENT,  
AND/OR BE REMOVED FROM BEING UNDER SEAL, FOR THE PURPOSE OF  
THEIR INSPECTION AND INCLUSION AS DEFENDANT’S EXHIBIT(S) FOR  
INTRODUCTION INTO EVIDENCE IN SUPPORT OF HIS RULE 33 PROCEEDINGS”**

Comes now the United States of America, by and through its undersigned counsel, to respond to the defendant John J. Connolly, Jr.’s motion for production of reports and other materials concerning one Jamie Parker. In response to said motion, the United States respectfully notes and represents the following:

1. In the defendant’s motion filed on July 15, 2005, he makes reference to a May 25, 2004 *Boston Herald* article captioned “Little Whitey Lies: Hit Witness Talks” in which one Jamie Parker is identified as a witness. *See Def. Motion, Exhibit A.*

2. The defendant then proceeds to make hyperbolic claims regarding these “newly discovered” statements made by Mr. Parker being “yet one more example of facts that were clearly material, relevant, and exculpatory that should have been fully disclosed to the defendant prior to his trial.” *Def. Motion at 2.*

4. Contrary to the defendant’s claims, in point of fact statements made by Jamie Parker

were made available to the defendant during the course of the pre-trial discovery process in the *Connolly* case. Specifically, a review of discovery records in the *Connolly* prosecution reveal that the following documents relating to Mr. Parker were disclosed to the defense:

**Bate Stamp Nos. 15250-15252– document disclosed on 7/21/00**

**Bate Stamp Nos. 26319-26320– document disclosed on 4/18/01**

**Bate Stamp Nos. 29122-29135– document disclosed on 5/31/01**

Thus, contrary to the unfounded and unsupported claims of the defendant, documents relating to Mr. Parker were provided to the defendant in the course of pre-trial discovery proceedings in this case. Accordingly, the Government respectfully submits that the defendant's motion is without merit and should be denied.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing Government's Response was mailed this  
19th day of July, 2005 to the following:

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